

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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2004 JUL 23 P 12:21

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,  
ELECTRICAL WORKERS' HEALTH AND  
WELFARE FUND, LOCAL 103, I.B.E.W.;  
ELECTRICAL WORKERS' PENSION FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
SUPPLEMENTARY HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' DEFERRED INCOME FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
JOINT APPRENTICESHIP AND TRAINING  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' EDUCATIONAL AND CULTURAL  
FUND; ANTHONY J. SALAMONE, as he is  
ADMINISTRATOR, NATIONAL ELECTRICAL  
BENEFIT FUND; and LOCAL 103, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,

Plaintiffs

vs.

THIBAULT CONTROLS, LLC,  
Defendant

and

FLEET BANK,  
Trustee

C.A. No. 04-10282 RGS

U.S. DISTRICT COURT  
DISTRICT OF MASS

**AFFIDAVIT OF ANNE R. SILLS**

1. My name is Anne R. Sills. I am an attorney with the law firm of Segal, Roitman & Coleman.
2. This firm has been involved in efforts to collect contributions owed the Electrical Workers' Employee Benefit Funds, Local 103, I.B.E.W. by Thibault Controls, LLC since on or

about July 28, 2003. Since that date, we have incurred legal fees of \$1,424.50 and costs of \$358.61.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 21<sup>st</sup> DAY OF JULY, 2004.

Anne R. Sills  
Anne R. Sills, Esquire

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the above Affidavit has been served by first class mail upon Thibault Controls, LLC c/o John Leboe, Esquire at 6 Loudon Road, Concord, NH 03110 this 22 day of July, 2004.

Gregory A. Geiman  
Gregory A. Geiman, Esquire